

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:	:	
Chad Anthony Lucabaugh	:	
	:	Chapter 13
Debtor	:	
	:	Case No. 1:15-bk-04588
JP Morgan Chase Bank, N.A.	:	
Movant	:	
v.	:	Answer to Motion for Relief
	:	from Stay
Chad Anthony Lucabaugh	:	
Respondent	:	
	:	

RESPONDENT REPLY TO MOTION FOR  
RELIEF FROM AUTOMATIC STAY OF SECURED CREDITOR

AND NOW, this 13<sup>th</sup> day of October, 2016, come the respondent, Chad Anthony Lucabaugh, by and through counsel, the CGA Law Firm, Craig S. Sharnetzka, Esquire, and do file the within response averring that:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Denied as stated. It is admitted that the Debtor has made some post-petition payments to date, the last payment made on the account was on September 27, 2016, in the amount of \$1,900.00.
6. Denied. The Debtor admits that he has made some payments, but he is uncertain as to the exact amount needed to reinstate the loan.
7. Denied. There is equity in the Vehicle. According to the Proof of Claim filed by the Movant in the within Chapter 13 Bankruptcy, the value of the Vehicle is

\$26,275.00 while the Proof of Claim reflects a balance of \$21,754.41 or less. Due to the equity cushion, Creditor is adequately protected.

8. Denied. Movant is not entitled to a waiver of Rule 4001(a)(3).

WHEREFORE, it is requested that the relief sought not be granted.

Respectfully submitted,

CGA Law Firm, PC

/s/ Craig S. Sharnetzka  
Craig S. Sharnetzka, Esquire  
Sup. Ct. I.D. No. 83863  
135 North George Street  
York, PA 17401  
(717) 848-4900  
Counsel for Debtors

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CERTIFICATE OF SERVICE

I hereby certify that on October 13, 2016, service upon all interested parties indicated below was made by sending a true and correct copy of the Answer to Motion for Relief, by ECF and/or regular US Mail, postage prepaid, upon:

Charles J. DeHart, III, Esquire (Trustee)  
ECF

Joshua I. Goldman, Esquire  
Suite 5000- BNY Independence Center  
701 Market Street  
Philadelphia, PA 19106-1532

/s/ Craig S. Sharnetzka  
Craig S. Sharnetzka, Esquire